

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ASHLEY D. GIBSON,

Defendant.

)
)
)
)
)
)
)
)
)
)
)

No. 4:21-CR-00186 AGF(NAB)

MOTION TO MODIFY BOND CONDITIONS

COMES NOW Defendant Ashley D. Gibson (“Gibson”), by and through her attorneys, William S. Margulis and Margulis Gelfand, LLC, and in support of her Motion to Modify Bond Conditions states as follows:

Gibson is charged in a multi-count indictment only in Count 1 with conspiracy to distribute and possess with intent to distribute controlled substances in violation of Title 21 U.S.C. § 841(a)(1) and punishable under Title 21 U.S.C. § 841(b)(1)(A)(viii). The second superseding indictment was filed on November 10, 2021.

Gibson was arrested on November 16, 2021, in the Eastern District of Kentucky in Lexington where she resides. She was released on her personal recognizance and ordered to appear in the Eastern District of Missouri on December 10, 2021. Gibson appeared in this Court via Zoom video with undersigned counsel as directed on December 10, 2021. This Court adopted in full the conditions of release set in the United States District Court for the Eastern District of Kentucky. This Court also added the following bond conditions: remain in their home during prescribed times in accordance with curfew as directed by the U.S. Pretrial Services Office and participate in location monitoring as directed by the U.S. Pretrial Services Office (Doc. 250).

Gibson is seeking to modify her bond conditions by requesting that this Court remove the condition that she participate in location monitoring, or in the alternative, remove the condition that she abide by a curfew set by the U.S. Pretrial Services Office.

Gibson is a single mother of two very young children and is employed in home healthcare six days per week. Her current assignments are in neighboring communities of Lexington, Kentucky which require at least a forty-minute commute each way. Gibson gets off work at 8:00 pm and is required to be home by 9:00 pm. This does not allow her sufficient time to pick up both children from daycare in two different locations or to go to the grocery store and have time to complete other life essential tasks for her and her children. Gibson also helps to care for her grandmother who is suffering from a terminal illness.

Gibson has complied with all her bond conditions and has had no violations.

WHEREFORE, Gibson prays that this Honorable Court enter an order modifying her bond conditions by removing the requirement for location monitoring, or in the alternative, removing the requirement for a curfew set by Pretrial, and for such further orders as the Court deems necessary.

Respectfully submitted,

Margulis Gelfand, LLC

/s/ William S. Margulis
WILLIAM S. MARGULIS, #37625
7700 Bonhomme Ave., Ste. 750
St. Louis, MO 63105
Telephone: 314.390.0234
Facsimile: 314.485.2264
bill@margulisgelfand.com
Counsel for Defendant

Certificate of Service

I hereby certify that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney.

/s/ William S. Margulis
WILLIAM S. MARGULIS, #37625
7700 Bonhomme Ave., Ste. 750
St. Louis, MO 63105
Telephone: 314.390.0234
Facsimile: 314.485.2264
bill@margulisgelfand.com
Counsel for Defendant